

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

Case No. 07 Civ. 6146

-against-

THEODORE ROXFORD a/k/a LAWRENCE  
DAVID NIREN and HOLLINGSWORTH,  
ROTHWELL & ROXFORD,

**CERTIFICATION OF  
RICHARD A. ROTH**

Defendants.  
-----X

I, Richard A. Roth, certify the following to be true and correct to the best of knowledge:

1. I have been a member of the Bar of this Court in good standing since 1986 and I am a member of The Roth Law Firm, PLLC, counsel of record in the above action for Defendant Hollingsworth Rothwell & Roxford ("HRR").

2. This application does not implicate the Defendant in this court action.

3. Pursuant to Local Rule 1.4, Richard A. Roth and The Roth Law Firm, PLLC move the Court for leave to withdraw as counsel for HRR in the above captioned action. The request is due to HRR's termination of my firm's representation and its desire to not oppose a motion for default judgment.

4. Plaintiff will not be substantially prejudiced by the granting of this application, and in fact Plaintiff has specifically indicated its willingness to not oppose this application. Similarly, nor will justice be hampered by this Court granting the pending motion. In fact, because HRR no longer wishes to defend this action and thus not oppose a motion for default, judicial resources will be substantially preserved.

5. For the Court's convenience, a Notice of Dismissal of Counsel and Consent to Entry of Default Judgment, which HRR instructed my firm to file, is annexed hereto as Exhibit A.

6. For the Court's convenience, a form Order is annexed hereto as Exhibit B.

7. A copy of this motion is being sent by email to Plaintiff's counsel, as well as each of the partners of HRR.

WHEREFORE, Movant seeks leave to permit The Roth Law Firm, PLLC, to withdraw as counsel for the Defendants.

Dated: New York, New York  
November 28, 2007

A handwritten signature in black ink, appearing to read 'Richard A. Roth', is written over a horizontal line.

Richard A. Roth (RAR 5538)  
The Roth Law Firm, PLLC  
545 Fifth Avenue, Suite 960  
New York, New York 10016  
(212) 542-8882

## EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**SECURITIES AND EXCHANGE  
COMMISSION,**

Plaintiff,

Case No. 07 Civ. 6146

-against-

**THEODORE ROXFORD a/k/a LAWRENCE  
DAVID NIREN and HOLLINGSWORTH,  
ROTHWELL & ROXFORD,**

Defendants.  
-----X

**NOTICE OF DISMISSAL OF COUNSEL  
AND CONSENT TO ENTRY OF DEFAULT JUDGMENT**

**WHEREAS,**

1. Defendant Hollingsworth, Rothwell & Roxford ("HRR") has no assets; and
2. Theodore Roxford a/k/a Lawrence David Niren, Kenneth Rothwell and Hugh Hollingsworth (collectively, the "HRR Partners") have each been advised of their rights as a corporate defendant in this case by The Roth Law Firm, as well as independent legal counsel, and desire to waive those rights; and
3. The HRR Partners desire to terminate the Roth Law Firm, PLLC as counsel to HRR in this lawsuit; and
4. The HRR Partners desire to permit Plaintiff to enter default judgment against HRR.

**PLEASE TAKE NOTICE THAT,**

1. HRR hereby permits Plaintiff to enter a default judgment against HRR in this lawsuit; and
2. HRR hereby terminates The Roth Law Firm, PLLC as counsel in this lawsuit; and
3. Facsimile signature herein shall be deemed good and sufficient so as to constitute an original signature.

\_\_\_\_\_  
Theodore Roxford a/k/a Lawrence Niren,  
As a Partner of HRR

Sworn to before me this  
\_\_\_\_ day of November, 2007

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Kenneth Rothwell, As a Partner of HRR

Sworn to before me this  
\_\_\_\_ day of November, 2007

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Hugh Hollingsworth, As a Partner of HRR

Sworn to before me this  
20 day of November, 2007

\_\_\_\_\_  
Notary Public

NOTARY PUBLIC-STATE OF FLORIDA  
Carol A. McHugh  
Commission # DD489964  
Expires: NOV. 13, 2009  
Bonded Thru Atlantic Bonding Co., Inc.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**SECURITIES AND EXCHANGE  
COMMISSION,**

Plaintiff,

Case No. 07 Civ. 6146

-against-

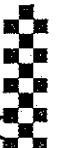
**THEODORE ROXFORD a/k/a LAWRENCE  
DAVID NIREN and HOLLINGSWORTH,  
ROTHWELL & ROXFORD,**

Defendants.  
-----X

**NOTICE OF DISMISSAL OF COUNSEL  
AND CONSENT TO ENTRY OF DEFAULT JUDGMENT**

**WHEREAS,**

1. Defendant Hollingsworth, Rothwell & Roxford ("HRR") has no assets; and
2. Theodore Roxford a/k/a Lawrence David Niren, Kenneth Rothwell and Hugh Hollingsworth (collectively, the "HRR Partners") have each been advised of their rights as a corporate defendant in this case by The Roth Law Firm, as well as independent legal counsel, and desire to waive those rights; and
3. The HRR Partners desire to terminate the Roth Law Firm, PLLC as counsel to HRR in this lawsuit; and
4. The HRR Partners desire to permit Plaintiff to enter default judgment against HRR.



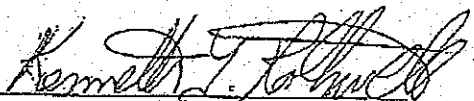
**PLEASE TAKE NOTICE THAT,**

1. HRR hereby permits Plaintiff to enter a default judgment against HRR in this lawsuit; and
2. HRR hereby terminates The Roth Law Firm, PLLC as counsel in this lawsuit; and
3. Facsimile signature herein shall be deemed good and sufficient so as to constitute an original signature.

\_\_\_\_\_  
Theodore Roxford a/k/a Lawrence Niren,  
As a Partner of HRR

Sworn to before me this  
\_\_\_\_ day of November, 2007

\_\_\_\_\_  
Notary Public

  
Kenneth Rothwell, As a Partner of HRR

Sworn to before me this  
14th day of November, 2007

  
Notary Public  
My Commission Expires 01-08-08

\_\_\_\_\_  
Hugh Hollingsworth, As a Partner of HRR

Sworn to before me this  
\_\_\_\_ day of November, 2007

\_\_\_\_\_  
Notary Public

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

Case No. 07 Civ. 6146

-against-

THEODORE ROXFORD a/k/a LAWRENCE  
DAVID NIREN and HOLLINGSWORTH,  
ROTHWELL & ROXFORD,

Defendants.  
-----X

**NOTICE OF DISMISSAL OF COUNSEL  
AND CONSENT TO ENTRY OF DEFAULT JUDGMENT**

WHEREAS,

1. Defendant Hollingsworth, Rothwell & Roxford ("HRR") has no assets; and
2. Theodore Roxford a/k/a Lawrence David Niren, Kenneth Rothwell and Hugh Hollingsworth (collectively, the "HRR Partners") have each been advised of their rights as a corporate defendant in this case by The Roth Law Firm, as well as independent legal counsel, and desire to waive those rights; and
3. The HRR Partners desire to terminate the Roth Law Firm, PLLC as counsel to HRR in this lawsuit; and
4. The HRR Partners desire to permit Plaintiff to enter default judgment against HRR.



**PLEASE TAKE NOTICE THAT:**

1. HRR hereby permits Plaintiff to enter a default judgment against HRR in this lawsuit and
2. HRR hereby terminates The Roth Law Firm, PLLC as counsel in this lawsuit and
3. Facsimile signatures herein shall be deemed good and sufficient in as to constitute an original signature.

*(No further fees or  
disputes anticipated)*  
*James W. H. [Signature]*  
HARRINGTON ROYCE & LAWSON, P.C.  
Attorney at Law  
As a Partner of HRR

Sworn to before me this  
13 day of November, 2007

Notary Public

Ernest H. H. [Signature] As a Partner of HRR

Sworn to before me this  
\_\_\_ day of November, 2007

Notary Public

Hugh H. H. [Signature] As a Partner of HRR

Sworn to before me this  
\_\_\_ day of November, 2007

Notary Public



CANADA	
SEPT. 18, 1953	JULY 28, 2005
UNITED STATES OF AMERICA	JULY 27, 2007
SEE PAGE 24	
<i>Lawrence W. C.</i>	
NOT VALID UNTIL SIGNED	



UNITED STATES OF AMERICA

## EXHIBIT B

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

Case No. 07 Civ. 6146

-against-

THEODORE ROXFORD a/k/a LAWRENCE  
DAVID NIREN and HOLLINGSWORTH,  
ROTHWELL & ROXFORD,

Defendants.  
-----X

**ORDER PERMITTING WITHDRAWAL**

This matter having come on to the Court upon motion of The Roth Law Firm, PLLC for leave to withdraw as counsel for Defendant Hollingsworth, Rothwell & Roxford; the Court having considered the Certification of Richard A. Roth and for good cause shown, it is, pursuant to L. Civ. R. 1.4 ordered that the motion is GRANTED. The Roth Law Firm, PLLC is hereby granted leave to withdraw as counsel within ten (10) days hereof.

Dated: New York, New York

\_\_\_\_\_  
HONORABLE P. KEVIN CASTEL  
UNITED STATES DISTRICT JUDGE